EXHIBIT I



Jori M. Loren
Partner
jori.loren@faegredrinker.com
+1 312 356 5116 direct

faegredrinker.com

Faegre Drinker Biddle & Reath LLP 320 South Canal Street, Suite 3300 Chicago, Illinois 60606 +1 312 569 1000 main +1 312 569 3000h Canal Street, Suite 3300 Chicago, Illinois 60606 +1 312 569 1000 main +1 312 569 3000 fax

Matthew P. Bergman Social Media Victims Law Center 821 Second Avenue, Suite 2100 Seattle, WA 98104 Phone: 206.741.4862

matt@socialmediavictims.org

Laura Marquez Garrett Social Media Victims Law Center 821 Second Avenue, Suite 2100 Seattle, WA 98104 Phone: 206.741.4862 laura@socialmediavictims.org

March 28, 2025

VIA EMAIL

Re: Nuala Mullen and Elizabeth Mullen v. TikTok, Inc. et al., Case No. 4:23-CV-00600-YGR

Dear Counsel:

Defendants have identified a number of production-related deficiencies in the case of Plaintiffs Nuala and Elizabeth Mullen. Indeed, in recent depositions, Plaintiffs identified various data sources and documents that have yet to be produced despite their responsiveness to Defendants' various Requests for Production ("RFPs"). The list of deficiencies below is not exhaustive, and Defendants reserve the right to raise additional production deficiencies to the extent we become aware of them. Please confirm that Plaintiffs will be able to resolve these deficiencies as quickly as possible or inform us of your availability for a meet and confer.

I. Failures to Produce Responsive Documents from Relevant Data Sources

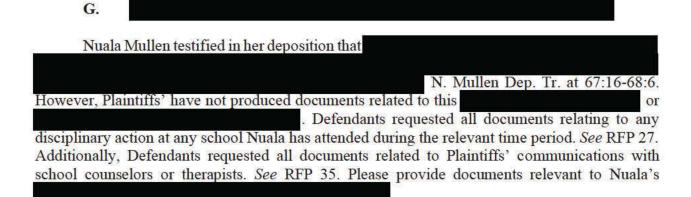
A. Nuala's Snapchat

Forensic collections from Plaintiffs' devices reflect Nuala Mullen's heavy and frequent use of Snapchat, and based on deposition testimony, her Snapchat account is likely to include information responsive to Defendants' RFPs. However, despite the account being included on the list of accounts identified on Nuala's iPhone 11 in the MDL BW Data Sources spreadsheet,

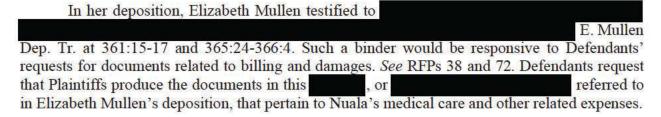
Page 3 of 6

. N. Mullen Dep. Tr. at 358:1-

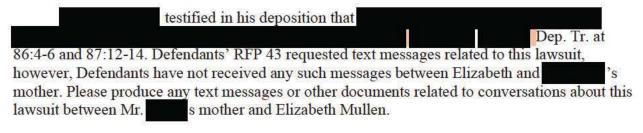
359:24. Defendants request the documentation from the iPhone 11 Nuala used to arrive at her responses in the Plaintiff Fact Sheet be produced.



H. Binder of Nuala's Medical and Other Related Expenses



I. Texts between Elizabeth and Mr. s Mother



J. Use of Additional Applications

In addition, forensic collections from Plaintiff's devices (and deposition testimony) reflect the use of a number of applications/accounts that likely contain information responsive to Defendants' document requests, but that do not appear to be included in existing productions. Those applications/accounts are listed below. As you may be aware, Judge Kuhl ordered production from additional applications/accounts at the March 19, 2025, Case Management Conference, and we believe productions from the applications/accounts identified are appropriate and consistent with Plaintiff's discovery obligations in this case.

BeReal Purple Buddy Twitter Pinterest VSCO Reddit

Hinge

GroupMe

YouTube

Period Tracker

Health

Netflix

Hulu

Disney+

Eating Well

Mayo Clinic

WebMD

Peacock

Flickr

Buzz.

Notes

Nuala testified that

Life360.SafetyMap

K. Additional Records from

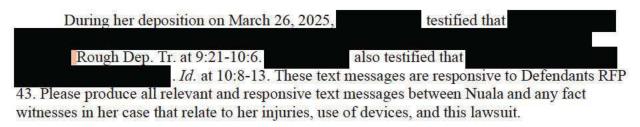
Elizabeth Mullen testified . E. Mullen Dep. Tr. at 427:11-19. Elizabeth testified that Id. at 428:2-11. Our review of records obtained from show only one date of service on These records note that . MULLENN-59MMO-00003-4. There is no mention of . E. Mullen Dep Tr. at 426:5-13. To the extent Elizabeth has an records in her possession custody and control related to her daughter's purported lease roduce those to Defendants immediately and please identify any other where Nuala is a patient and upload the 01 necessary authorizations to MDL-Centrality so Defendants can collect these records from the facilities directly. L. Additional Records from During her deposition, Nuala Mullen testified that she continued to see her after filing her filed her lawsuit. Nuala testified that

53:14-57:6, and thus these records are relevant. Plaintiff has not provided any treatment records for her after October 2022. To the extent these records are in Plaintiff's possession custody and control, please produce to Defendants immediately.

. N. Mullen Dep Tr. at 24:4-26:1.

, id. at

M. Nuala's Messages with



With the close of fact discovery and bellwether selection quickly approaching, please confirm you will cure the deficiencies outlined above within ten days of the receipt of this letter. If not, please provide times you are available to meet and confer on these topics.

Sincerely,

/s/ Jori M. Loren
Jori M. Loren